

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

LABATON SUCHAROW LLP

March 25, 2013

VIA ECF

The Honorable Dennis M. Cavanaugh
United States District Court
M.L. King, Jr. Federal Building & Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *In re Schering-Plough Corporation/ENHANCE Securities Litigation*, No. 08-397
(DMC) (JAD)

Dear Judge Cavanaugh:

On behalf of Lead Plaintiffs, Arkansas Teacher Retirement System, Public Employees' Retirement of Mississippi, Louisiana Municipal Police Employees' Retirement System and Massachusetts Pension Reserves Investment Management Board, we hereby consent to the Court's intention to appoint Stephen M. Greenberg and Jonathan J. Lerner as Special Masters pursuant to Federal Rules of Civil Procedure 23(h)(4) and 54 (d)(2)(D) to recommend and report to the Court on issues arising from Plaintiffs' Counsels' application for legal fees and expenses.

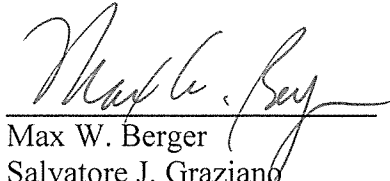
In addition, consistent with *UFCW Local 880-Retail Food Employees Joint Pension Fund v. Newmont Mining Corp.*, 05-cv-01100, 2008 U.S. Dist. LEXIS 1805 (D. Co. Jan. 9, 2008) and *In re TFT-LCD (Flat Panel Antitrust Litigation)*, MDL No. 1827 (N.D. Ca. 2002),¹ Lead Plaintiffs respectfully request that the Court include the following language in its order appointing Stephen M. Greenberg and Jonathan J. Lerner as Special Masters:

The Special Masters are authorized to set such time limits and procedures as may be necessary for the filing of motions and other material relevant to the issues before them, but all directives issued by them and any submission by any party to them shall also be filed with the District Court's CM/ECF system, which shall provide the public record for this phase of the case. Pursuant to Rule 53(b)(2)(B), the Special Master may communicate *ex parte* with the Court at any time. The Special Master shall not communicate *ex parte* with any party without first providing notice to, and receiving consent from, plaintiffs' Co-Lead Counsel and the Class Representatives.

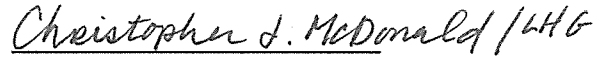
¹ Both *UFCW Local 880* and *TFT-LCD* were cited by the Court in its Amended Notice of Intention to Appoint Special Masters Pursuant to Federal Rules of Civil Procedure 23(h)(4) and 54(d)(2)(D).

Hon. Dennis M. Cavanaugh
March 25, 2013
Page 2

Respectfully Submitted,



Max W. Berger
Salvatore J. Graziano
**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 554-1400
Facsimile: (212) 554-1444



Jonathan M. Plasse
Christopher J. McDonald
LABATON SUCHAROW LLP
140 Broadway
New York, NY 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477

Co-Lead Counsel for the Class

cc: All Counsel (Via ECF)